



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

UPS TRACKING #: 1ZA4216Y0192274147

Date: 1/31/2022

George Ballman, Pres.
Pella Mid-Atlantic, Inc.
12100 Baltimore Ave. Ste 1
Beltsville, MD 20705

RE: Section 402(c) Renovation, Repair, and Painting Rule Compliance Inspection under Section 409 of the Toxic Substances Control Act (TSCA)

Dear Mr. Ballman:

This is to provide notice that Mr. Paul J. Ruge Jr. will visit your office, located at 12100 Baltimore Ave., Ste 1, Beltsville, MD 20705 **on Tuesday, February 15, 2022 at 10:00 AM**, to conduct a Renovation, Repair, and Painting (RRP) Rule inspection. Mr. Ruge, assisting the Environmental Protection Agency (EPA) under a cooperative agreement with the Center for Workforce Inclusion (Center), is designated by the EPA administrator to conduct inspections under Section 409 of the Toxic Substance Control Act (TSCA). Mr. Ruge will ask you some questions and collect a random sample of your contracts. To save time during the inspection, **please have available for review and collection** by the inspector, the following documents from January 1, 2021 to the present, being sure to include any and all documents for the work performed at **(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)(b) (6)**:

1. **A list of all jobs your firm started and/or completed during the last 12 months.** The list should include the date of the contract, the address where the work was performed, and the date the property was built;
2. **A list of all residential properties or child occupied facilities built before 1978 where renovation, remodeling, or other work which disturbed more than 6 square feet of paint for interior renovations or more than 20 square feet of paint for exterior renovations was conducted by you or employees of your company. Please also identify all properties on the list for which window replacement and/or demolition was performed, regardless of the square feet of painted surface that was disturbed.** You may identify these properties on the same list you provide for #1 above. For these properties, also provide a brief description of the scope of work, and if known, the number and ages of any children that resided at the property. Activities which *disturb* painted surface may include but are not limited to: sanding, scraping, water-blasting, power-washing, removal/cut-outs, demolition, etc.;



3. **All contracts for renovations designated in #2 above, including any attachments, contract modifications/addendums, receipts, photographs, permits, and RRP documentation.**
This should include but is not limited to: receipts of acknowledgment for the pre-renovation notification informational pamphlet, lead testing documentation, training records, work-practices checklists, etc.

Note: If a detailed description of the scope of work is *not* already included in the contract, or *no* written contracts for your jobs exist, **prepare a detailed written description (form enclosed) of the scope of work in advance of the inspection or be prepared to describe the scope of work during the inspection.** The description should include the total square feet of painted surfaces disturbed;
4. **Copies of your current (and if applicable, your expired) EPA Lead Firm certificates;**
5. **A list of all employees that work for your company and copies of current (and if applicable, expired) RRP Renovator certificates for all employees who performed work for your firm AND “on the job” training records for workers who performed work for your firm and were trained in lead safe work practices by an RRP Certified Renovator;**
6. **A list of any Sub/Independent Contractors you hire (Name, Address, and Phone #), and:**
 - a. Copies of each sub/independent contractor’s EPA firm certification (current and expired);
 - b. Copies of each RRP Renovator’s certifications for the sub/independent contractor’s employees;
 - c. Copies of contracts/invoices between you or your firm and the sub/independent contractor for renovations on pre-1978 properties (Inspector Ruge may randomly select some contracts for review).

To confirm the date, time, and location of the inspection, or should you have any questions, please call Inspector Ruge at 410-305-2683 or email at ruge.paul@epa.gov. For more information go to epa.gov/lead.

Sincerely,

(b) (6)

Paul J. Ruge Jr.

U.S. Environmental Protection Agency
Land and Chemicals Division
Toxics Program Branch
EPA Environmental Science Center
701 Mapes Road
Fort Meade, MD 20755
Phone: (410) 305-2683
ruge.paul@epa.gov

CONTRACT FOR RRP JOB

PARTIES ENTERING THE CONTRACT:
YOU/YOUR FIRM:

OWNER/GENERAL CONTRACTOR/SUBCONTRACTOR/OTHER:

CONTRACT DATE: _____

ADDRESS WHERE WORK WAS PERFORMED:

START DATE: _____

END DATE: _____

DETAILED DESCRIPTION OF THE SCOPE OF WORK:

COMPENSATION RECEIVED FOR PERFORMING JOB: _____

SQUARE FEET OF PAINTED SURFACE DISTURBED: (*scraped, sanded, demolished, cut-out, removed, pressure-washed, heated, or otherwise disturbed*)

INTERIOR: _____ sq. ft. EXTERIOR: _____ sq. ft.

WINDOWS REPLACED? Yes / No (circle one) If Yes, how many? _____

What were the replaced windows made of (circle one): Wood, Vinyl, Aluminum
Were they painted? Y / N

YOUR NAME: _____ TITLE: _____

SIGNATURE: _____ DATE: _____